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**Attorneys for Plaintiff
SELECT PORTFOLIO SERVICING, INC.,
a Utah corporation**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SELECT PORTFOLIO SERVICING, INC., a Utah corporation,

Plaintiff,

V.

ABRAHAM VALENTINO, an individual;
JOHN CHU, an individual;
CORPORATE COUNSEL LAW GROUP LLP, a
California limited liability partnership;
NESZHAO CONSULTING COMPANY, LLC, a
California limited liability company;
KEVIN NESBITT, an individual; and
DOES 1 through 25.

Defendants.

Case No.: 3:12-cv-00334 SI

STIPULATION AND [PROPOSED] ORDER
EXTENDING PLAINTIFF'S TIME TO
OPPOSE MOTION BY DEFENDANTS
KEVIN NESBITT AND NESZHAO
CONSULTING COMPANY, LLC, TO
DISMISS THE COMPLAINT;
DECLARATION OF MARCUS T. BROWN

Date: April 20, 2012

Date: April 20,
Time: 9:00 a.m.

Place: Courtroom 10, 19th Floor

Hon. Susan Illston

Plaintiff and Defendants KEVIN NESBITT (“Nesbitt”) and NESZHAO CONSULTING COMPANY, LLC, (“Neszhaoo”) stipulate as follows and respectfully request that the court enter the proposed order set forth below pursuant to Civil Local Rule 6-2.

WHEREAS, on March 7, 2012, Nesbitt and Neszhao filed their amended motion to dismiss,

WHEREAS, there have been no previous time modifications on this motion,

WHEREAS, the time modification requested herein would not otherwise effect the schedule for this case, and

WHEREAS, Plaintiff reasonably requires additional time to prepare its opposition to

1 Nesbitt's and Neszhao's motion,

2 NOW, THEREFORE, Plaintiff, Nesbitt, and Neszhao hereby STIPULATE and agree that
3 Plaintiff's time to oppose Nesbitt's and Neszhao's motion to dismiss Plaintiff's complaint shall be
4 extended up to and including March 30, 2012.

5 IT IS SO STIPULATED.

6 DATED: March 20, 2012

WOLFE & WYMAN LLP

7
8 By: 
STUART B. WOLFE
MARCUS T. BROWN

9
10 Attorneys for Plaintiff
11 **SELECT PORTFOLIO SERVICING, INC., a**
12 **Utah corporation**

13 DATED: March 20, 2012

14 LAW OFFICES OF RICHARD S.E. JOHNS,
15 ORM & GRABSTEIN

16 By: 
17 RICHARD S.E. JOHNS
18 Attorneys for Defendants
19 **NESZHAO CONSULTING CO. and KEVIN**
20 **NESBITT**

DECLARATION OF MARCUS T. BROWN

21 I, Marcus T. Brown, hereby declare as follows in support of the foregoing stipulated request:

22 1. I am a competent adult. The following is based upon my personal knowledge, and if called to
23 testify, I could and would competently testify thereto.

24 2. I am an attorney of record for Plaintiff.

25 3. Plaintiff's opposition to the motion to dismiss filed by Nesbitt and Neszhao is currently due
26 on March 21, 2012.

27 4. Plaintiff and I require additional time to adequately prepare the opposition to Nesbitt's and
28 Neszhao's motion to dismiss and are, therefore, requesting an additional nine days.

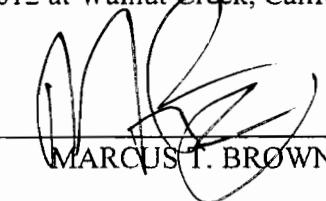
29 5. There have been no other time modifications in this case, except that some dates were
30 changed due to the judicial reassignments and related recusal.

1 6. To the best of my knowledge, the requested time modification would have no effect on the
2 schedule for this case.

3 I declare under penalty of perjury under the laws of the United States of America and the
4 State of California that the foregoing is true and correct.

5 Executed this 21st day of March 2012 at Walnut Creek, California.

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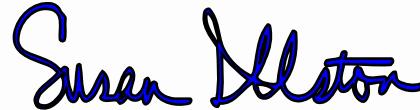
MARCUS T. BROWN

[PROPOSED] ORDER

10 Based on the foregoing stipulation and good cause appearing, the court ORDERS that
11 Plaintiff's time to oppose the motion by Defendants Kevin Nesbitt and Neszhao Consulting
12 Company, LLC, to dismiss Plaintiff's complaint shall be extended up to and including March 30,
13 2012.

14 IT IS SO ORDERED.

15 Dated: 3/22, 2012.


HON. SUSAN ILLSTON
U.S. DISTRICT COURT JUDGE